

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THE COALITION TO PROTEST THE
DEMOCRATIC NATIONAL CONVENTION, et al.

Plaintiffs,

v.

THE CITY OF BOSTON, et al.,

Defendants.

CIVIL ACTION
NO.

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION
AND EMERGENCY MOTION FOR EXPEDITED HEARING**

Plaintiffs in the above-captioned Civil Action hereby move the Court for an injunction directing the defendants to permit them to march along Causeway Street in Boston during the 2004 Democratic National Convention ("the Convention"), from July 25 to July 29, 2004, in accordance with rights secured to the plaintiffs under the Constitution, laws and regulations of the United States.

Due to the urgency of the requested relief, the Coalition respectfully requests that this Court further order an expedited hearing on this Motion for Preliminary Injunction, to take place on or before July 21, 2004.

Because the Coalition is likely to succeed on the merits of its claim, and will be irreparably harmed unless the requested relief issues, which harm outweighs any risk of harm to the defendants, and as further supported by the plaintiffs' Complaint and Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Injunction, the plaintiffs move this Court to enjoin Defendants' conduct as follows:

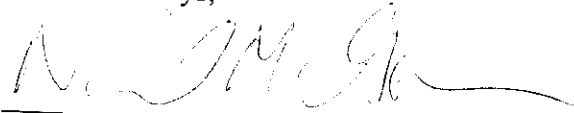
- a) enter an injunction directing the Defendant to issue a permit to the plaintiffs entitling them to march and demonstrate along Causeway Street on each of July 25 - July 29, 2004.

WHEREFORE, the Coalition requests that the Court grant the preliminary injunction.

Respectfully submitted,

The Coalition to Protest the Democratic
National Convention,

By its attorneys,



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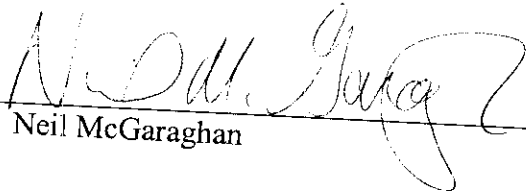
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Dated: July 14, 2004

CERTIFICATE OF SERVICE

I hereby certify that on the 14 Day of July, 2004, I caused a true copy of the above document to be served by hand upon the appropriate agent of the city responsible for receiving service of process.


Neil McGaraghan